

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests

2000 Discontinuance of Service on Portion of Pipeline

ILLINOIS
COMMERCE COMMISSION

JUN 6 2 06 PM '01

CHIEF CLERK'S OFFICE

Docket No.: 00-0462

Date of Request: July 19, 2000

Response Request Date: August 18, 2000

ENG 1.1 Fully describe 4" line in question. Please include diameter, length, type of material, age, type of corrosion protection, design pressure (at time of installation and at time of incident) etc.

RESPONSE:

The 4" line was installed in 1992, approximately 2 miles PVC (plastic) pipe and approximately 4 miles of steel pipe. The line was designed to handle low volumes and low psi.

Date: August 18, 2000

OFFICIAL FILE

ILL. C. C. DOCKET NO. 00-462-00-0582
EPC Exhibit No. 1.1 Public

Witness _____

Date 5/4/01 Reporter [Signature]

EQUILON GROUP EXHIBIT 1.1 (REDACTED)

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
2000 Discontinuance of Service on Portion of Pipeline

Docket No.: 00-0462

Date of Request: July 19, 2000

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ENG 1.2 If line is abandoned, will it be left in place without further use? Will line be filled with inert grout?

RESPONSE:

The line will be nitrogen purged and abandoned in place.

Date: August 18, 2000

Equilon Pipeline Company LLC
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ENG 1.3 Is there any possible future use for line? If yes, explain what the Company foresees.

RESPONSE:

There are no present plans for future use of this line.

Date: August 18, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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ENG 1.4 Has the Company considered rehabilitating line? If yes, fully explain findings. If no, explain why not.

RESPONSE:

Yes, but at this time, rehabilitation would cost more than the revenue generated.

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ENG 1.5 Is it a redundant line now? Please fully explain situation.

RESPONSE:

The line is the only line serving the leases connected and there is no other line available. The leases connected can and will be serviced with truck transportation..

Date: August 18, 2000

Equilon Pipeline Company LLC
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ENG 1.6 What is the historical usage on this line and what companies have used this line (last 3 years)? Please provide contact names and phone numbers, and break down usage information by month.

RESPONSE:

This line had been historically for crude oil gathering. Approximately 100 barrels were gathered daily. The companies served by this line are:

(REDACTED)

Date: August 18, 2000

Equilon Pipeline Company LLC
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ENG 1.7 Please provide EPA (Environmental Protection Agency) contact name and number familiar with oil leak incident of June 18, 2000.

RESPONSE:

Cheryl Kelly, with the IEPA responded to the leak. Her telephone number is 618-346-5120.

Date: August 18, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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ENG 1.8 Why does Equilon want to abandon line in lieu of repairing it? Please fully explain.

RESPONSE:

Equilon desires to abandon the line in lieu of repairing because it is not economical to repair. The line ran less than 100 barrels per day with a tariff of \$0.1301 and that volume continues to decline.

Date: August 18, 2000

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ENG 1.9 Will taking the line in question out of service impact Equilon's ability to meet the public need for its oil transport service? Fully explain why or why not.

RESPONSE:

Taking the pipeline out of service will not severely impact the public need for its oil transportation. There are several trucking companies that are willing to transport the oil to a market.

Date: August 18, 2000

Equilon Pipeline Company LLC
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ENG 1.10 Has Equilon's financial fitness been impacted as a result of the June 18, 2000 spill on the line? Fully explain why or why not.

RESPONSE:

Very recently the pipeline experienced a release and the cost of clean up was over \$100,000. Cost of trucking the barrels would be less than maintaining the line.

Date: August 18, 2000

Equilon Pipeline Company LLC
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ENG 1.11 Is it in the public's interest to remove line in question from service? Fully explain why or why not.

RESPONSE:

Equilon believes that the volumes on this system could easily be handled by trucking and to rehabilitate the system would cost more than the value it would add.

Date: August 18, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.12 **Provide general pipe map of line in question. Map should be of the operational and maintenance type. Please contact Staff if there are any questions regarding this request.**

Response: See attached map. Our investigation continues for other maps that will satisfy Staff's request and will not be overly burdensome to reproduce.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

ENG 1.12 Attachment

T.3N. - R.2E.

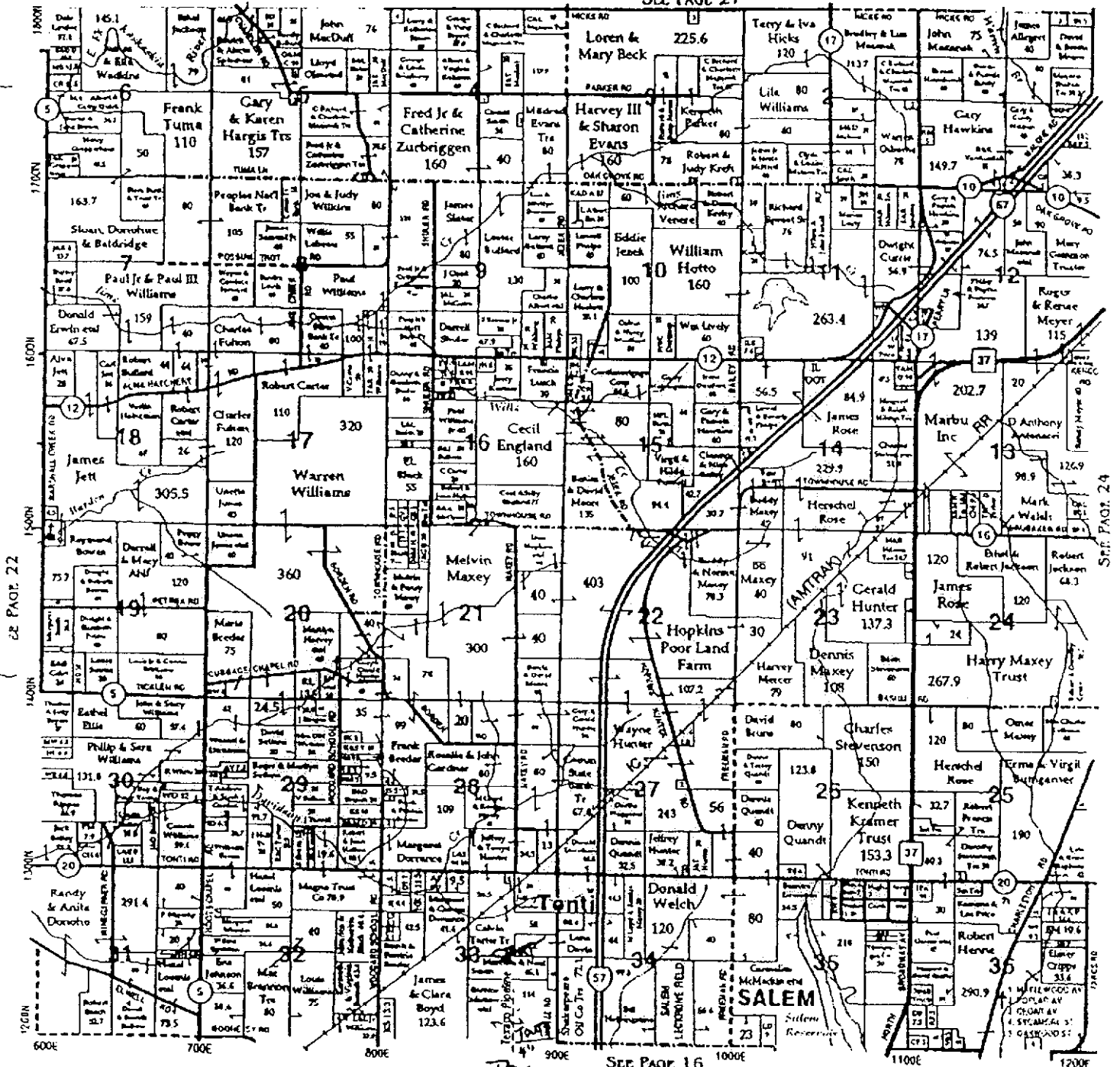
© 1994 Civil Cartographers, Inc. A Civil Map 34001



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SEE PAGE 27



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SEE PAGE 16

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.13 **What type of external corrosion protection, if any, was utilized on each of these lines? A breakdown by pipeline segment, if applicable, is requested.**

Response: The 4 miles of steel pipe referred to in ENG 1.1 is coated line with cathodic protection. The coating provides external protection.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.14 What type of internal corrosion protection was utilized on the line?

Response: There is no internal corrosion protection on the line.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.15 **Has the pipeline been properly maintained per 49 CFR Part 195? Has line been cleaned out periodically (pigged)? If not, provide the petition submitted under 190.9 for approval that to do so would be impractical under 49CFR 195.120.**

Response: The 4" is not DOT regulated, however it has been maintained per Equilon's requirements which follow DOT regulations. The line has been periodically pigged.

Date of Request: October 25, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.16 **If pipeline is abandoned, will it be left in place without further use? Will line(s) be filled with inert grout or will nitrogen purge be the only operation the Company will perform? Will line be cleaned out with maintenance device (pig) in order to remove residual oil prior to nitrogen purge? Refer to Company's answer to ENG 1.2.**

Response: The line will be nitrogen purged and abandoned in place. The residual oil will be removed from the line.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.17 **Is there any possible future use for pipeline or any of the pipeline? If yes, explain what the Company foresees for all segments of the pipeline.**

Response: There are no present plans for Equilon to use this line in the future.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

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Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.18 What is the condition of the pipeline system? Have the leaks(s) been repaired? Will pipeline pass a pressure test? Has the Company performed such a test since the leak (June 18, 2000)?

Response: Equilon desires to abandon the line in lieu of repairing because it is not economical to repair. The line ran less the 100 barrels per day with a tariff of \$0.1301 and that volume continues to decline. The pipeline has not been pressure tested since the leak.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

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Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.19 Will taking the lines in question out of service cause any extra cost for the transportation service? What party will bear the cost?

Response: Equilon Pipeline Company LLC does not have the cost information regarding truck transportation.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

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Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.20 If Equilon wishes to abandon service due to economic reasons, provide all studies, reports, etc., the Company performed that demonstrate keeping each of the line in question in service is no longer economically feasible.

Response: Very recently the pipeline experienced a release and the cost of the clean up was over \$100,000. Cost of trucking the barrels would be less than maintaining the line. See also Response to ENG 1.18.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.21 If Equilon receives permission to abandon the lines, are said lines going to be permanently marked? How will this permanent marking system be maintained and administered?

Response: Equilon will do what is required by the applicable statutes and regulations.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.22 Please describe how all pipe segments meet 49 CFR 195 Subpart C.

Response: This line is not regulated under 49 CFR 195 Subpart C

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

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Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.23 What part of the pipeline is not in a rural area (as described in 49 CFR 195.2)?

Response: All of the pipeline is in a rural area.

Date of Request: October 25, 2000

Response Request Date: November 8, 2000

EQUILON PIPELINE COMPANY LLC

ICC DOCKET NO. 00-0462

Response to Staff Data Request ENG 1.12 - ENG 1.24

ENG 1.24 **Provide pressure test records for each pipeline segment in the system. Original pressure test records (before line was placed in service) as well as any recent test records are requested.**

Response: Maximum operating pressure = 95.

Date of Request: October 25, 2000

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EQUILON PIPELINE COMPANY LLC

**ICC DOCKET NOS. 00-0462 & 00-0582
Response to Staff Data Request ENG 1.25**

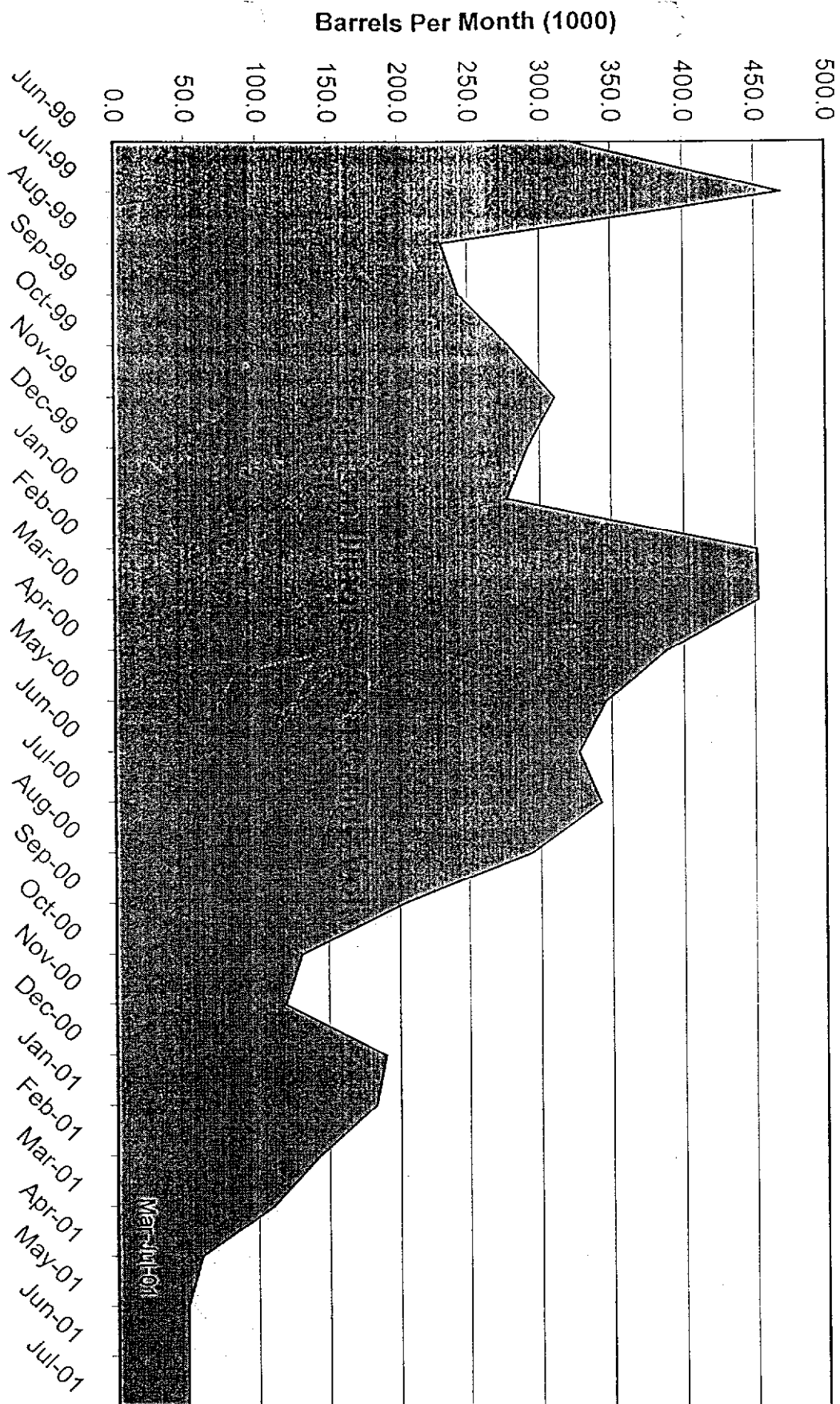
ENG 1.25 Please provide work papers to support production quantities (lines 63 to 66) and trucking transportation costs (lines 89-97) stated in direct testimony of L. S. Letner.

Response: See attached graph entitled "Equilon Illinois Basin Crude Volumes" (Attachment 1) and table (Attachment 2).

Date of Request: March 16, 2000

Response Request Date: April 6, 2001

Equilon Illinois Basin Crude Volumes



Illinois Gathering System
Historical Pipeline Volumes
ICC Request

Jun-99	322.5	
Jul-99	469.3	
Aug-99	231.8	
Sep-99	243.8	
Oct-99	278.7	
Nov-99	310.7	
Dec-99	291.5	
Jan-00	277.3	
Feb-00	451.9	
Mar-00	452.7	
Apr-00	388.3	
May-00	345.9	
Jun-00	327.1	
Jul-00	342.4	
Aug-00	293.6	
Sep-00	202.9	
Oct-00	131.0	
Nov-00	119.5	
Dec-00	190.0	
Jan-01	183.1	
Feb-01	142.9	
Mar-01	110.0	Estimated
Apr-01	60.0	"
May-01	50.0	"
Jun-01	50.0	"
Jul-01	50.0	"

Trucking Rates		Trucking Rates	
Miles	Total Rate	Miles	Total Rate
5	0.619	155	2.349
10	0.666	160	2.412
15	0.724	165	2.477
20	0.775	170	2.540
25	0.827	175	2.603
30	0.885	180	2.668
35	0.937	185	2.730
40	1.016	190	2.794
45	1.095	195	2.858
50	1.175	200	2.922
55	1.208	205	2.987
60	1.238	210	3.048
65	1.310	215	3.111
70	1.381	220	3.174
75	1.453	225	3.239
80	1.524	230	3.302
85	1.566	235	3.364
90	1.606	240	3.429
95	1.674	245	3.493
100	1.742	250	2.556
105	1.810	255	2.619
110	1.877	260	2.683
115	1.945	265	2.746
120	2.013	270	3.810
125	2.042	275	3.874
130	2.109	280	3.937
135	2.134	285	4.000
140	2.199	290	4.064
145	2.223	295	4.128
150	2.287	300	4.191

This table has been prepared by Equilon Trucking to address the Illinois Commerce Commission's question regarding the cost to truck production oil from leases in Illinois. In the specific case of transporting oil from two leases in the Salem area to Clay City, distances of 35-40 miles each, the cost would be \$0.937 to \$1.016 per barrel. As has been discussed earlier, it is at Clay City that the shipper, Countrymark, would transship their oil into their pipeline for delivery to their refinery at Mt. Vernon, IN.

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
2000 Discontinuance of Service on Portion of Pipeline

Docket No.: 00-0582

Date of Request: September 20, 2000

Response Request Date: October 4, 2000

ENG 1.1 Fully describe each part of the 4" through 10" line in question. Refer to sketch of pipeline system included in August 30, 2000 petition. Please include diameter, length, type of material, age, type of internal and external corrosion protection, design pressure, etc. for all pipeline segments at question.

RESPONSE:

4" Brooks Unit to Salem Unit

Diameter: 4"

Length: Approx. 49 miles

Type of Material: Steel

Age: Laid 1993

Internal Corrosion Protection: none

External Protection: Cathodic protection

Design Pressure: Maximum Operating Pressure = all gravity, free flow

6" Woodlawn to Salem

Diameter: 6"

Length: Approx. 21.37 miles

Type of Material: Steel

Age: Laid 1941

Internal Corrosion Protection: Idle

External Protection: Cathodic protection

Design Pressure: Maximum Operating Pressure = Idle

8" Salem to Clay City

Diameter: 8"

Length: Approx. 43 miles

Type of Material: Steel

Age: Laid 1939

Internal Corrosion Protection: Corrosive inhibitors

External Protection: Cathodic protection

Design Pressure: Maximum Operating Pressure = 807

10" Clay City to Lawrenceville

Diameter: 8"

Length: Approx. 37 miles

Type of Material: Steel

Age: Laid 1939

Internal Corrosion Protection: Corrosive inhibitors

External Protection: Cathodic protection

Design Pressure: Maximum Operating Pressure = 325

10" Lawrenceville to Mt Vernon, IN

Diameter: 10"

Length: Approx. 57 miles

Type of Material: Steel

Age: Laid 1940

Internal Corrosion Protection: Corrosive inhibitors

External Protection: Cathodic protection

Design Pressure: Maximum Operating Pressure = 600

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
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Docket No.: 00-0582

Date of Request:

Response Request Date: October 4, 2000

ENG 1.2 Provide general pipe map of lines in question. Map should be of the operational and maintenance type. Please contact Staff if there are any questions regarding this request.

RESPONSE: See map attached to Petition as Exhibit A. Our investigation continues for other maps that will satisfy Staff's request and will not be overly burdensome to reproduce.

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
2000 Discontinuance of Service on Portion of Pipeline

Docket No.: 00-0582

Date of Request: September 20, 2000

Response Request Date: October 4, 2000

ENG 1.3 Have there been any leaks of products on any of the lines in question in the last 5 years? If yes, fully describe each leak. Provide copies of all safety related condition reports pursuant to 49 CFR 195.56.

RESPONSE:

Given the timeframe for response, and the fairly recent corporate creation of Equilon Pipeline Company LLC, a full 5 year leak history for the subject lines is not available at this time. Examination of files, and discussion with employees has located information on the following releases. Should further information responsive to this question become available in the future, Equilon reserves the right to supplement this response.

6" Lawrenceville to Mt Vernon line. September, 1998 release of approximately 10 bbls of crude oil due to external corrosion. Equilon notified the IEPA (#982276) and responded immediately. The IEPA has issued VN #E-1999-00030 for this release.

8" Salem to Clay City line. February, 1999 release of approximately 20 bbls of crude oil due to internal corrosion. Equilon notified the IEPA (#990398) and responded immediately. The IEPA has issued VN #E-1999-00099 for this release.

10" Clay City to Lawrenceville line. July, 1999 release of approximately 1 bbl of crude oil due to internal/external corrosion. Equilon notified the IEPA (#991640) and responded immediately.

Two additional releases of unknown quantity within the requested timeframe may have occurred on the 6" Lawrenceville to Mt Vernon, and 10" Clay City to Lawrenceville lines, respectively. However, confirmation of these releases are not available at the time of this response.

Date: October 4, 2000

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ENG 1.4 What product was shipped and is currently being shipped via these lines?

RESPONSE:

These lines were used for crude petroleum transportation.

Date: October 4, 2000

Equilon Pipeline Company LLC
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ENG 1.5 What type of external corrosion protection, if any, was utilized on each of these lines? A breakdown by circuit, if applicable, is requested.

RESPONSE:

4" Brooks Unit to Salem Unit

External Protection: Cathodic protection

6" Woodlawn to Salem

External Protection: Cathodic protection

8" Salem to Clay City

External Protection: Cathodic protection

10" Clay City to Lawrenceville

External Protection: Cathodic protection

10" Lawrenceville to Mt Vernon, IN

External Protection: Cathodic protection

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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ENG 1.6 What type of internal corrosion protection was utilized on the lines in question? Have the pipeline(s) in question been properly maintained per 49 CFR Part 195? Have lines been cleaned out periodically (pigged)? If not, provide the petition submitted under 190.9 for approval that to do so would be impractical under 49 CFR 195.120.

RESPONSE:

4" Brooks Unit to Salem Unit

Internal Corrosion Protection: none

6" Woodlawn to Salem

Internal Corrosion Protection: Idle

8" Salem to Clay City

Internal Corrosion Protection: Corrosive inhibitors

10" Clay City to Lawrenceville

Internal Corrosion Protection: Corrosive inhibitors

10" Lawrenceville to Mt Vernon, IN

Internal Corrosion Protection: Corrosive inhibitors

The lines have been pigged.

Date: October 4, 2000

Equilon Pipeline Company LLC
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ENG 1.7 If pipeline is abandoned will it be left in place without further use? Will line(s) be filled with inert grout? Will line(s) be cleaned out with maintenance device (pig) prior to abandonment?

RESPONSE:

The lines will be nitrogen purged and abandoned in place.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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ENG 1.8 - Is there any possible future use for pipeline or any part of the pipeline? If yes, explain what the Company foresees for all segments of the pipeline.

RESPONSE:

There are no present plans for the future of these lines.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Response Request Date: October 4, 2000

ENG 1.9 What is the condition of pipeline system? Has the Company considered upgrading or rehabilitating lines? If yes, fully explain. If not, explain why not.

RESPONSE:

The company was in the process of beginning assessment of the condition of the lines. Smart pigging had been budgeted for the 8" Salem to Clay City and the 10" from Clay City to Lawrencville in order to evaluate upgrading or rehabilitating the line. However, with the loss of volume recently experienced it is uneconomic to operate the lines much less to upgrade or rehabilitate them.

Date: October 6, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Date of Request: September 20, 2000

Response Request Date: October 4, 2000

ENG 1.10 Are any of the lines redundant now? Please fully explain the situation.

RESPONSE:

The 10" Clay City to Lawrenceville and the 6" Lawrenceville to Mt Vernon are redundant.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Response Request Date: October 4, 2000

ENG 1.11 What is the historical usage on these lines and what Companies have used these lines (in the last 3 years)? Please provide contact names and phone numbers, and break down usage by line and month.

RESPONSE:

1998 approximately 10,000 barrels per day
1999 approximately 7,500 barrels per day
2000 approximately 3,100 barrels per day

(REDACTED)

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
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Response Request Date: October 4, 2000

ENG 1.12 Why does Equilon want to abandon these lines? Please fully explain.

RESPONSE:

These lines have become uneconomical to operate since the costs exceed the revenues. Volume has been lost to a competing pipeline.

Date: October 6, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Response Request Date: October 4, 2000

ENG 1.13 Will taking the lines in question out of service impact Equilon's ability to meet the public need for its transport service? Fully explain why or why not.

RESPONSE: Taking these pipelines out of service will not severely impact the public need for its oil transportation. There are several trucking companies that are willing to transport the oil to a market.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Response Request Date: October 4, 2000

ENG 1.14 Will taking the lines in question out of service cause any extra cost for the transportation service? What party will bear this extra cost?

RESPONSE: Equilon Pipeline Company LLC does not have the cost information regarding truck transportation. If there is increased cost in transportation, the "extra cost" will be the responsibility of the purchaser of the crude oil.

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ILLINOIS COMMERCE COMMISSION
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ENG 1.15 Is it in the public's best interest to remove the lines in question from service?
Fully explain why or why not.

RESPONSE:

Taking these pipelines out of service will not severely impact the public need for its oil transportation. There are several trucking companies that are willing to transport the oil to a market.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Date of Request:

Response Request Date: October 4, 2000

ENG 1.16 If Equilon wishes to abandon service due to economic reasons, provide all studies, reports, etc., the company performed that demonstrate keeping each of the lines in question in service is no longer economically feasible.

RESPONSE:

Today: (as of 10/6/00)

Total \$ invoiced for April-- \$106, 856

*Direct expense costs ytd monthly average through April \$101,283

Future:

Best case:

Revenue- \$106,856 (Volumes stay the same 7,501 bpd--April volume)

*Direct Expense \$ 50,000 (assuming half of the expenses go with the 12" going to Products)

NIBT \$ 56,856

Most Likely:

Revenue \$50,000 (Half the volume leaves when Countrymark begins running 6")

*Direct Expense \$50,000

NIBT \$0

Worst Case:

Revenue \$33,214 (Pump 1,500 bbl to Countrymark at Clay City or Bridgeport @ \$.7381)

*Direct Expense \$50,000

NIBT (\$16,786)

Date: October 6, 2000

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ENG 1.17 If Equilon receives permission to abandon the lines, are said lines going to be permanently marked? How will this permanent marking system be maintained and administered?

RESPONSE:

Equilon will do what is required by the applicable statutes and regulations.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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ENG 1.18 Please describe how all pipe segments meet 49 CFR 195 Subpart C.

RESPONSE: The segments are not regulated under 49 CFR 195 Subpart C.

Date: October 4, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
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Date of Request:

Response Request Date: October 4, 2000

ENG 1.19 What part of pipeline is not in a Rural Area (as described in 49 CFR 195.2)?

RESPONSE:

The 10" Clay city to Lawrenceville to Clay City has approximately 1,000 feet of pipe that runs under a manufacturing parking lot.

Date: October 6, 2000

Equilon Pipeline Company LLC
ILLINOIS COMMERCE COMMISSION
Staff Data Requests
2000 Discontinuance of Service on Portion of Pipeline

Docket No.: 00-0582

Date of Request: September 20, 2000

Response Request Date: October 4, 2000

ENG 1.20 Provide pressure test records for each pipeline segment in pipeline segment in the system.

RESPONSE:

4" Brooks Unit to Salem Unit

Design Pressure: Maximum Operating Pressure = all gravity, free flow

6" Woodlawn to Salem

Design Pressure: Maximum Operating Pressure = Idle

8" Salem to Clay City

Design Pressure: Maximum Operating Pressure = 807

10" Clay City to Lawrenceville

Design Pressure: Maximum Operating Pressure = 325

10" Lawrenceville to Mt Vernon, IN

Design Pressure: Maximum Operating Pressure = 600

Date: October 4, 2000

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Equilon Pipeline Company LLC

Petition for Emergency and Expedited Relief for authority to discontinue service on a portion of Equilon Pipeline Company LLC's facilities which it is operating pursuant to a Certificate of Convenience and Necessity issued by the Illinois Commerce Commission under Order No. 98-0248 which includes 4 inch pipeline near Salem, Illinois, in Marion County, and related assets and facilities used in connection herewith.

00-0462

(Cons.)

Equilon Pipeline Company LLC

Petition for Authority to Discontinue Service Portions of Equilon Pipeline Company LLC's facilities which it is operating pursuant to a Certificate of Good Standing issued by the Illinois Commerce Commission under Order No. 98-0248 which includes 4, 6, 8 and 10 inch pipelines near Salem, Illinois, in Marion County, and related assets and facilities used in connection herewith.

00-0582

AFFIDAVIT OF LYNN S. LETNER

Lynn S. Letner, being first duly sworn on oath, deposes and says as follows:

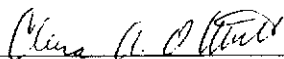
1. Equilon Group Exhibit 1.1, which is attached hereto and consists of Equilon Pipeline Company LLC's responses to Staff Data Requests ENG-1.1 through ENG-1.25 in Docket No. 00-0462 and ENG-1.1 through ENG-1.20 in Docket No. 00-0582, have been reviewed by me and I am familiar with the content of said responses. The information set forth in this Exhibit is true and correct to the best of my knowledge information and belief.

2. Further Affiant sayeth naught.



Lynn S. Letner

Subscribed and sworn to before me this 16 day of May, 2001.



NOTARY PUBLIC

